

EXHIBIT I

Kevin Gannon

From: Kevin Gannon
Sent: Friday, July 14, 2023 5:18 PM
To: Deeva V. Shah
Cc: ktimbers@sunsteinlaw.com; Singular; kvp-singular; matthiaskamber@paulhastings.com; abhansali@kblfirm.com; mkwun@kblfirm.com; Nathan R. Speed; anant.saraswat@wolfgreenfield.com
Subject: Re: Singular v. Google Prod Vol GOOG-SING026

Counsel,

We are in receipt of Google's production volume GOOG-SING026, bearing Bates numbers GOOG-SING-00242320-2343. The production includes important new evidence relevant to the parties' claims and defenses, which should have been produced prior to the close of fact discovery more than two years ago.

I am writing to request a meet and confer in advance of filing an emergency motion to reopen discovery for the limited purpose of addressing issues related this production. Please provide a time or times between 9 AM and 4 PM est on Monday when you are available to discuss the relief we plan to seek from the Court. We would like to discuss, among other things, the following issues:

- An explanation as to how Google's prior searches for and collection of responsive documents did not locate copies of the documents and communications in the production;
- An explanation as to how these documents were just discovered less than two months before trial, including what prompted this recent search for relevant documents; and
- What, if any, steps Google has taken since locating these documents to ensure that other documents were not similarly omitted from Google's previous productions.

Our motion will seek an order requiring Google to supplement its production with at least the following information and documents:

- The individual email addresses for the two distribution lists/group email addresses (sgb-team@google.com and Google-Brain-team@google.com) in the "To" field of the Dean Email;
- Any and all replies to or forwards of the Dean Email; and
- Any and all replies to or forwards of the emails at GOOG-SING-00242338, 00242339, 00242340, 00242341 and 00242343 as well as the PDF attachments to those emails.

We will also seek leave to re-open the deposition of Jeff Dean following our receipt of Google's answers to the above-referenced questions and its supplemental production and reserve the right to seek further discovery based on those answers and information revealed by Google's supplemental production.

Please advise of your availability for a call on Monday at your earliest convenience.

Regards,

Kevin

On Jul 12, 2023, at 6:46 PM, Deeva V. Shah <dshah@keker.com> wrote:

Counsel:

Please find attached correspondence regarding Google production volume 26. In the course of preparing for trial, we identified these documents, which had not been previously produced. The password will follow in a separate email.

Regards,

Deeva

Deeva V. Shah

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